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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
IAN HOFFMANN,  
  
Defendant.

CASE NO. 2:21-CR-00017 JAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: July 27, 2021  
TIME: 9:30 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant Ian Hoffmann, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 27, 2021.
2. By this stipulation, the defendant now moves to continue the status conference until October 26, 2021, and to exclude time between July 27, 2021, and October 26, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over 2,000 pages. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

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1           b)     Counsel for the defendant desires additional time to consult with his client, review  
2 the current charges, review and copy discovery for this matter, and discuss potential resolutions  
3 with his client.

4           c)     Counsel for the defendant believes that failure to grant the above-requested  
5 continuance would deny him the reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7           d)     The government does not object to the continuance.

8           e)     Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11          f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of July 27, 2021, to October 26, 2021,  
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
14 because it results from a continuance granted by the Court at the defendant's request on the basis  
15 of the Court's finding that the ends of justice served by taking such action outweigh the best  
16 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 23, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

/s/ SAM STEFANKI  
SAM STEFANKI  
Assistant United States Attorney

Dated: July 23, 2021

/s/ TODD LERAS  
TODD LERAS  
Counsel for Defendant  
IAN HOFFMANN

#### FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 23<sup>rd</sup> day of July, 2021.

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE